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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Implementation of the  
Pay Telephone Reclassification  
and Compensation Provisions of the  
Telecommunications Act of 1996

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CC Docket No. 96-128  
DA 97-2214

To: Chief, Common Carrier Bureau

COMMENTS OF ILLUMINET, INC.

Illuminet, Inc. ("Illuminet"),<sup>1</sup> by its attorneys, hereby responds to the Public Notice, released October 20, 1997 ("Public Notice") seeking comment on three pending petitions for waiver<sup>2</sup> concerning the requirement that local exchange carriers ("LECs") and other payphone service providers provide payphone-specific coding digits ("Payphone Coding") to interexchange carriers ("IXCs"). Illuminet opposes any suggestion that the Commission limit the technical solutions available to the LECs in meeting their Payphone Coding obligations.<sup>3</sup> Any such

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<sup>1/</sup> Illuminet is owned by more than 250 Local Exchange Companies ("LECs"), and provides a wide variety of services to more than 900 Independents nationwide. Illuminet provides similar services to a wide variety of interexchange carriers, wireless carriers, and competitive local exchange carriers. Illuminet's services include an Independent SS7 network and related database services, calling card billing validation services, 800 RESPORG services and revenue administration, and other related database services. Illuminet also provides Line Information Data Base ("LIDB") based originating line screening ("OLS") service.

<sup>2/</sup> The United States Telephone Association ("USTA") (petition filed September 30, 1997; the LEC ANI Coalition (petition filed September 30, 1997); and TDS Communications Corporation ("TDS") (petition filed October 1, 1997) (collectively, "the Petitioners").

<sup>3/</sup> See, e.g., AT&T Corp. Opposition to USTA and TDS Petitions for Waiver, CC Docket No. 96-128, filed October 7, 1997 ("AT&T Opposition") at 1-4. See also, Ex Parte Letter from AT&T to John B. Muleta, October 14, 1997.

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limitation is contrary to the public interest and established Commission policies, and, therefore, should be rejected. Moreover, in the absence of ensuring the availability of technical options to meet the Payphone Coding requirements, LECs may be required to make wastefully duplicative investment in other technologies even though existing economic access to the OLS LIDB platform can meet the Commission's requirements in a more rational manner. Accordingly, Illuminet respectfully requests that the Commission re-affirm that LECs may utilize either FLEX-ANI or an OLS LIDB platform to meet their respective Payphone Coding requirements. In support thereof, the following is shown:

Payphone Coding can be provided either through Flex ANI or through the OLS LIDB platform. Four members of the LEC ANI Coalition, for example, each of which has elected a LIDB function (i.e., OLNS) to meet its obligations in the payphone fraud prevention proceeding, do not believe that Flex ANI is a cost-effective solution for payphone identification in the long term.<sup>4</sup> Illuminet's OLS LIDB platform is feature-rich and capable of multiple service provisioning. While this LIDB platform is now used for OLS fraud prevention,<sup>5</sup> it can also be used to identify payphones for purposes of payphone compensation by March 9, 1998.<sup>6</sup>

Illuminet currently provides LIDB services to over 900 Independent LECs nationwide. These LECs may be looking to the LIDB in order to comply with their respective Payphone Coding obligations since the payphone detail already resides with the LIDB. Providing the OLS

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<sup>4/</sup> See LEC ANI Coalition Petition at 3-4.

<sup>5/</sup> Illuminet's OLS LIDB is based on Bellcore's specifications (GR1158).

<sup>6/</sup> See Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Order, CC Docket No. 96-128, released October 7, 1997.

LIDB solution will enable a uniform resolution of the Payphone Coding requirements for these LECs in an economically rational manner. Moreover, the availability of the OLS LIDB should resolve any compliance issue associated with non-equal access offices.

Despite the availability of an OLS LIDB solution, AT&T suggests that all LECs be forced to implement AT&T's business decision that, effectively, would require all LECs to move forward with a Flex ANI-only plan to meet Payphone Coding obligations.<sup>7</sup> Compelling all LECs to comport with AT&T's "solution" would, however, be contrary to the public interest and contradict prior decisions which ensured technical options for LECs to meet new service requirements.<sup>8</sup>

These Commission decisions readily demonstrate the public interest benefits associated with providing options to LECs to meet new service requirements.<sup>9</sup> These decisions, and the policies they embrace, reflect the fact that existing networks differ: a rational deployment choice

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<sup>7</sup>/ See, e.g., AT&T Opposition at 4; see also AT&T Ex Parte Letter at 2, filed October 14, 1997. Illuminet understands that the AT&T's so-called ANI-II solution would require "hard coding" of additional ANI digits. USTA already has demonstrated this to be prohibitively expensive. See USTA Petition at 10.

<sup>8</sup>/ See, e.g., In the Matter of Policies and Rule Concerning Operator Service Access and Pay Telephone Compensation, CC Docket No. 91-35, Third Report and Order, FCC No. 96-131 (rel. April 5, 1996) ("OLS Order"), Memorandum Opinion and Order, CC Docket No. 91-35, DA No. 96-2169 (rel. December 20, 1996); see also Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Report and Order, 11 FCC Rcd 20 at 50-51 (1996), Order on Reconsideration, 11 FCC Rcd 21 at 46 (1996); In the Matter of Provision of Access for 800 Service, Memorandum Opinion and Order on Reconsideration and Second Supplemental Notice of Proposed Rulemaking, CC Docket No. 86-10, 6 FCC Rcd 5421 at 5426 (1991) citing Report and Order, 4 FCC Rcd at 2829, n.90. In the OLS Order, for example, the Commission clearly recognized that OLS could be provided through three different existing technologies, including LIDB, and decided against restricting carriers' options. See OLS Order at 12-13, 18, 20.

<sup>9</sup>/ Id.

within one network may be uneconomical in another. Illuminet is not aware of any rational basis upon which to conclude that the Commission intended in this proceeding to disturb its long-standing policies regarding the availability of technical options in order for companies to comply with their Payphone Coding obligations. Rather, the various waiver requests in this proceeding compel consistent application of policies which encourage reasoned decision-making and flexible business planning.

Compelling deployment of Flex ANI may also result in further delay in implementing the Commission's requirements.<sup>10</sup> Illuminet agrees with USTA that it would be contrary to the public interest and past Commission actions to require LECs "to shoulder the technical, financial, and administrative burdens of providing a specific form of payphone coding information such as Flex ANI when alternative technologies such as OLS are available and sufficient to meet the per-call tracking obligations of IXC's."<sup>11</sup>

The Commission, therefore, should permit LECs to meet their Payphone Coding obligations through either Flex ANI or the OLS LIDB in ways that "comport with the technological limitations of LECs."<sup>12</sup> Absent the availability of payphone codes through either Flex ANI or OLS LIDB, extension of the existing waiver beyond March 9, 1998 may be more practical,<sup>13</sup> especially if parties continue to insist upon limited technical Payphone Coding

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<sup>10/</sup> See USTA Petition at 9-10; LEC ANI Coalition Petition at 3-4; TDS Petition at 2.

<sup>11/</sup> USTA Petition at 3.

<sup>12/</sup> Id.

<sup>13/</sup> USTA seeks waiver until July 9, 1998; TDS seeks waiver until July 1, 1998; and the LEC ANI Coalition seeks waiver until the Commission issues an order clarifying the LECs' payphone specific coding requirements.

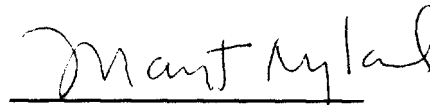
solutions.

Accordingly, Illuminet respectfully requests that the Commission re-affirm its prior decisions and policies which enable LECs to select the most economically rational method of complying with the provision of additional Payphone Coding available, i.e., the use of either FLEX ANI or the OLS LIDB functionality. Absent this affirmation, the ability to proceed to a timely resolution of the implementation issues associated with meeting Payphone Coding obligations may be delayed, the costs of compliance increased, and the goals established by the Commission in this proceeding frustrated.

Respectfully submitted,

**ILLUMINET, INC.**

By



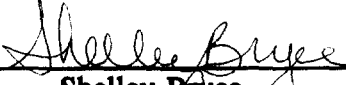
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October 30, 1997

### Certificate of Service

I, Shelley Bryce, of Kraskin & Lesse, LLP, 2120 L Street, NW, Suite 520, Washington, DC, 20037, hereby certify that a copy of the foregoing "Comments" was served on this 30th day of October, 1997, by first-class U.S. mail to the following parties:

  
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